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CASE SUMMARY

CASE NO. J5-CV-24-274397

Vanessa Bissereth vs. Javitch Block, LLC, Bank of America, N.A.

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Location: **Precinct Five**
Judicial Officer: **Olivo, Rick "Rico"**
Filed on: **11/20/2024**
Appear by: **01/30/2025**

CASE INFORMATION

Case Type: **Small Claims**

DATE

CASE ASSIGNMENT

Current Case Assignment

Case Number J5-CV-24-274397
Court Precinct Five
Date Assigned 11/20/2024
Judicial Officer Olivo, Rick "Rico"






PARTY INFORMATION

Plaintiff	Bissereth, Vanessa	<i>Attorneys</i> ZIMMER, ROBERT <i>Retained</i> 512-434-0306(W) 1108 LAVACA STREET SUITE 110-187 AUSTIN, TX 78701
Defendant	Bank of America, N.A. 160 MINE LAKE CT STE 200 Raleigh, NC 27615 Javitch Block, LLC 5301 SOUTHWEST PKWY STE 400 Austin, TX 78735	LANDSEN, TYLER G <i>Retained</i> 214-383-9088(W) 275 W. CAMPBELL, SUITE 312 RICHARDSON, TX 75080 LANDSEN, TYLER G <i>Retained</i> 214-383-9088(W) 275 W. CAMPBELL, SUITE 312 RICHARDSON, TX 75080

DATE

EVENTS & ORDERS OF THE COURT











INDEX

11/20/2024	Original Petition (OCA)	
11/20/2024	 Petition/Application via E-File <i>Plaintiff's Original Petition / MB</i>	
11/20/2024	 Affidavit of Inability Filed <i>Plaintiff's Affidavit of Inability to Pay Court Costs / MB</i>	
11/25/2024	 Sent to Judge's Workflow Queue <i>ORDER ON PLFF'S STATEMENT OF INABILITY / MB</i>	
11/27/2024	 Affidavit of Inability Granted <i>JUDGE OLIVO / MB</i>	
12/13/2024	 Request	

CASE SUMMARY

CASE No. J5-CV-24-274397

PLFF REQ FOR UPDATE ON STMNT OF INAB./ AL

12/17/2024	 Citation Issued <i>SENT TO CN5 / MB</i>
12/17/2024	Service  Javitch Block, LLC Served: 12/23/2024 Actual Server: Constable Return Date/Time: 01/08/2025 Serving Method: In Person Service Tracking Comment: /AQ Bank of America, N.A. Unserved
12/30/2024	 Original Answer Party: Defendant Javitch Block, LLC; Defendant Bank of America, N.A. <i>Defendants' Original Answer / MB</i>
12/30/2024	 Motion for Discovery <i>Plaintiff's Motion to Allow Discovery as to Defendant Javitch Block, LLC, and to Apply the Rules of Evidence / MB</i>
01/07/2025	 Sent to Judge's Workflow Queue <i>Proposed Order on Plaintiff's Motion to Allow Discovery and to Apply the Rules of Evidence / MB</i>
01/07/2025	 Jury Demand (Fee Paid) Party: Plaintiff Bissereth, Vanessa <i>Plaintiff's Jury Demand /IC</i>
01/07/2025	 Order for Discovery <i>PLAINTIFF'S MOTION FOR DISCOVERY IS GRANTED. PLAINTIFF'S MOTION TO APPLY THE RULES OF EVIDENCE IS DENIED. (VJ BEELER) / MB</i>
01/09/2025	 Hearing Set <i>IP PT FOR JD HRG SET FOR JAN 30 2025 AT 10:30 AM. PARTIES NOTIFIED BY MAIL, EMAIL IF ON FILE WITH THE COURT /IC</i>
01/13/2025	 Action <i>Order on Plaintiff's Motion to Allow Discovery and to Apply the Rules of Evidence, emailed and mailed to parties / MB</i>
01/30/2025	 Motion Hearing (10:30 AM) (Judicial Officer: Olivo, Rick "Rico") Events: 01/09/2025 Hearing Set

DATE

FINANCIAL INFORMATION

Plaintiff Bissereth, Vanessa

Total Charges

224.00

Total Payments and Credits

224.00

Balance Due as of 01/14/2025

0.00

J5-CV-24-274397
NO. _____VANESSA BISSERETH,
Plaintiff

IN THE JUSTICE COURT

VS.

PRECINCT NO. 5

BANK OF AMERICA, N.A.,
and JAVITCH BLOCK, LLC,
Defendants,

TRAVIS COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Plaintiff VANESSA BISSERETH ("Bissereth"), and files this, her Original Petition, complaining of DEFENDANTS Bank of America, N.A. ("BofA"), and Javitch Block, LLC ("Javitch Block"), and for causes of action would respectfully show this Honorable Court the following:

PARTIES

Plaintiff Vanessa Bissereth is a resident of Travis County, Texas.

Defendant Bank of America N.A. is a financial institution domiciled in North Carolina, which does or transacts business in Texas.

Defendant Bank of America N.A., maybe be served with process via its Registered Agent, CT CORPORATION SYSTEM, at 160 MINE LAKE CT., STE. 200, RALEIGH, NORTH CAROLINA, 27615.

Defendant Javitch Block, LLC is a limited liability corporations domiciled in Ohio, which does or transacts business in Texas.

Defendant Javitch Block, LLC may be served with process through its Registered Agent, REGISTERED AGENT SOLUTIONS, CORPORATE CENTER ONE, 5301 SOUTHWEST PARKWAY, STE. 400, AUSTIN, TX 78735.

VENUE AND JURISDICTION

1. Venue is proper in this Court because Travis County, Texas is where events giving rise to Bissereth's claims occurred (see Tex. Civ. Prac. & Rem. Code §§ 15.002(a).
2. The amount in controversy is within the jurisdictional limits of this Court, i.e., \$20,000.00.

FACTUAL ALLEGATIONS

3. At all times relevant to this claim, Bissereth was a "consumer" as that term is defined in the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. § 1692a(3), and the Texas Debt Collection Act ("TDCA"), Tex Fin. Code § 392.001(1).
4. At all times relevant to this claim, Javitch Block was both a "debt collector" and a "third-party debt collector" as those terms are defined in the TDCA § 392.001(6) and (7) respectively, and a "debt collector" as that term is defined in the FDCPA § 1692a(6).
5. At all times relevant to this claim, BofA Javitch was a "debt collector" as that term is defined in the TDCA § 392.001(6).
6. The FDCPA and TDCA claims in this lawsuit arose from BofA's and Javitch Block's illegal attempts to collect a consumer debt from Bissereth (Javitch Block File No. 2141980) (the "alleged debt").
7. Bissereth did not incur the alleged debt; she was a victim of identity theft.

8. On June 23rd, 2021, Bissereth filed a police report with the Austin Police Department regarding the identity theft (the “police report”).
9. On or about July 2021, Bissereth notified the credit bureaus that she had been a victim of identity theft, and concurrently she disputed the alleged debt with all three credit bureaus.
10. Nonetheless, Defendants sued Bissereth on August 2, 2024 to recover the alleged debt from her (*Bank of America, N.A. v. Vanessa Bissereth* - J1-CV-24-004065 in Travis County, Texas, JP #1 (“the debt claim case”).
11. In Defendants’ pleadings in the debt claim case, Defendants falsely stated that Bissereth owes the alleged debt, when she does not.
12. On or about August 2024, and again in October 2024, Bissereth disputed the alleged debt with Defendants and furnished them with proof of identity theft.
13. However, despite knowing for months that the alleged debt was not valid, Defendants have refused to dismiss the debt claim case against her.
14. Despite knowing that Bissereth did not owe the alleged debt, BofA has been falsely communicating to the credit bureaus that Bissereth owes the debt and that it is valid.
15. Due to BofA’s false credit reporting and false statements regarding the alleged debt, the cost of obtaining credit increased for Bissereth.

CAUSES OF ACTION

COUNT I

VIOLATION OF THE TEXAS DEBT COLLECTION ACT (“TDCA”), TEX. FIN. CODE §392 *et seq.*

16. Bissereth incorporates the preceding paragraphs as if set forth at length.

17. Despite being aware Bissereth was a victim of ID theft, BofA violated the TDCA §392.301(a)(3) by falsely communicating to the credit bureaus that Bissereth owed an undisputed debt.
18. Javitch Block and BofA violated the TDCA § 392.202 by failing to legitimately investigate the validity of the alleged debt upon receipt of Bissereth's claim.
19. Instead, Javitch Block and BofA both simply mailed Bissereth a computer-generated form letter containing conclusory statements claiming the debt is valid, without actually investigating Bissereth's dispute.
20. Javitch Block violated the TDCA § 392.304(a)(18) by sending Bissereth debt collection letters, and filing pleadings in the debt claim case, which falsely represent that Bissereth owes the alleged debt.
21. As a result of BofA's and Javitch Block's violations of the TDCA § 392.202 and § 392.301(a)(3), Bissereth is entitled to an order directing Defendants to permanently cease collection on the alleged debt, pursuant to TDCA §392.403(a)(1); statutory damages of no less than \$100.00, pursuant to the TDCA §392.403(e); actual damages; and attorney fees pursuant to TDCA § 392.403(c).

COUNT II

VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT, 15. U.S.C. § 1692 et seq.

22. Bissereth incorporates the preceding paragraphs as if set forth at length.

23. Despite being aware Bissereh was a victim of ID theft, Javitch Block violated the FDCPA § 1692e(10) falsely stating, in both letters and court pleadings, that Bissereh owes the alleged debt when she does not.

24. As a result of Javitch Block's violations of the FDCPA, Bissereh is entitled to statutory damages of \$1,000.00; actual damages according to proof; and an award of attorney fees and costs, per FDCPA § 1692k(a).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Vanessa Bissereh prays that this Court award judgment in her favor and against Defendants Bank of America, N.A. and Javitch Block, LLC., as follows:

- a. As to both Defendants, award Bissereh statutory damages of no less than \$100.00; actual damages according to proof; and attorney fees and costs of court, per the TDCA § 392.403;
- b. Enter an order enjoining both Defendants from engaging in any further collection activities on this alleged debt as to Bissereh, the order being authorized by the TDCA § 392.403;
- c. As to Defendant Javitch Block, award Bissereh \$1,000.00 in statutory damages; actual damages according to proof; and attorney fees and costs of court, per the FDPCA § 1692k(a).
- d. award Bissereh any other relief to which she is entitled, in law or in equity.

[signature block on next page]

Respectfully Submitted,

Zimmer & Associates, A Law Firm

1108 Lavaca Street, Suite 110-187

Austin, Texas 78701

Telephone/Fax: (512) 434-0306

/s/ Robert Zimmer

By: **Robert Zimmer, Esq.**

State Bar No. 24098662

zimmerlawTX@gmail.com

**ATTORNEY FOR PLAINTIFF,
VANESSA BISSERETH**

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA
AVISO: ESTE DOCUMENTO CONTIENE INFORMACIÓN
CONFIDENCIAL



**Statement of Inability to Afford Payment
of Court Costs or an Appeal Bond**
**Declaración sobre Incapacidad de Pago de Costas
de Tribunal o de una Fianza de Apelación**

Cause Number
Número de Caso

The Clerk's office will fill in the Cause Number when you file this form.

El Secretario del Tribunal anotará el Número de Caso cuando usted presente este formulario.

Vanessa Bissereth
v.
Bank of America, N.A. and
Javitch Block, LLC

Copy information listed at the top left of
the petition here.

Copie aquí la información ubicada en la
parte superior izquierda del escrito de la
demanda.

Copy information listed at the top right of the petition here.

Copie aquí la información ubicada en la parte superior derecha del escrito de la
demanda.

Justice of the Peace Court, Precinct #5

Court Number
Número del Tribunal

Travis, Texas
County
Condado

- ☐ District Court
Tribunal de Distrito
- ☐ County Court
Tribunal del Condado
- ☐ County Court at Law
Tribunal Estatutario
- ☒ Justice Court
Juzgado de Paz
- ☐ Probate Court
Juzgado Sucesorio

1. Your Information / Su Información

- My full legal name is / Mi nombre legal completo es

Vanessa Bissereh

First Middle Last / Nombre de Pila Segundo Nombre Apellido

- My date of birth is / Mi fecha de nacimiento es

[REDACTED]

Month Day Year / Mes Día Año

- My address is / Mi dirección es

Home / Domicilio 9606 Hansford Dr.

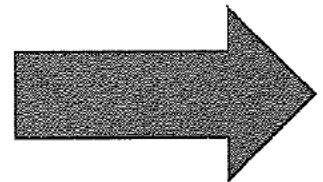
Mailing / Dirección Postal Austin, TX, 78753

- My phone number / Mi número telefónico [REDACTED] 4683

- My email I check often / Mi correo electrónico que reviso con frecuencia

[REDACTED]@icloud.com

Go to next page



Pase a la siguiente página

2. About My Dependents / Mis Dependientes

“The people who depend on me financially are listed below.” **Use initials only for children under 18.** If needed, attach a separate piece of paper to list more dependents.

“Las personas a continuación dependen económicamente de mí.” **Use iniciales para los menores de 18 años** y, si es necesario, anexe una hoja por separado para enumerar a todos sus dependientes.

Name Nombre	Age Edad	Relationship to me Parentesco Conmigo

3. Are you represented by Legal Aid? ¿Está siendo representado por alguna entidad de asistencia legal?

Check only one box. Seleccione solo una casilla.

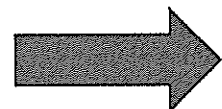
☒ I am being represented in this case for free by an attorney who works for a legal aid provider or who received my case through a legal aid provider. I have attached the certificate the legal aid provider gave me as “Exhibit: Legal Aid Certificate.”

Me está representando gratuitamente un abogado que trabaja para una entidad de asistencia legal o que recibió mi caso de una entidad de asistencia legal. El certificado que la entidad de asistencia legal me entregó lo adjunto bajo el título, “Anexo: Certificado de Asistencia Legal.”

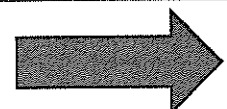
or / o

☐ I am not represented by legal aid.

No me está representando ninguna entidad de asistencia legal.



4. Public Benefits / Beneficios de Asistencia Pública																	
<p>➤ Do you or any of your dependents receive public benefits? <i>¿Recibe usted o sus dependientes beneficios de asistencia pública?</i></p> <p><input checked="" type="checkbox"/> Yes / <i>Sí</i> <input type="checkbox"/> No / <i>No</i></p>																	
<p>➤ If you answered yes, check all that apply and attach proof to this form, such as a copy of an eligibility form or check.</p> <p>Si respondió con un Sí, marque todas las casillas que apliquen y adjunte a este formulario comprobantes, tales como una copia de la carta autorizando que reciba estos beneficios o una copia del cheque que recibe.</p> <table border="0" style="width: 100%;"> <tr> <td><input type="checkbox"/> Food stamps/SNAP Cupones de comida/SNAP</td> <td><input type="checkbox"/> TANF</td> </tr> <tr> <td><input type="checkbox"/> Medicaid</td> <td><input type="checkbox"/> CHIP</td> </tr> <tr> <td><input type="checkbox"/> SSI/SSDI</td> <td><input type="checkbox"/> WIC</td> </tr> <tr> <td><input type="checkbox"/> Lifeline</td> <td><input type="checkbox"/> Public Housing or Section 8 Housing Asistencia de Vivienda / Programa de Vivienda bajo Sección 8</td> </tr> <tr> <td><input type="checkbox"/> Low-Income Home Energy Assistance Asistencia con Energía Eléctrica</td> <td><input type="checkbox"/> Community Care via HHS Ayuda Comunitaria bajo HHS</td> </tr> <tr> <td><input type="checkbox"/> LIS in Medicare ("Extra Help") Subsidio Adicional de Medicare bajo el Programa LIS</td> <td><input type="checkbox"/> Needs-based VA Pension Pensión para Veteranos de Guerra en función a necesidades</td> </tr> <tr> <td><input type="checkbox"/> Child Care Assistance under Child Care and Development Block Grant Asistencia con Guardería bajo el Programa CCDBG</td> <td><input type="checkbox"/> County Assistance, County Health Care, or General Assistance (GA) Asistencia del Condado, Asistencia Médica del Condado, o Asistencia General (GA)</td> </tr> <tr> <td><input checked="" type="checkbox"/> Other / Otros beneficios <u>MAP</u></td> <td><input type="checkbox"/> Other / Otros beneficios</td> </tr> </table>		<input type="checkbox"/> Food stamps/SNAP Cupones de comida/SNAP	<input type="checkbox"/> TANF	<input type="checkbox"/> Medicaid	<input type="checkbox"/> CHIP	<input type="checkbox"/> SSI/SSDI	<input type="checkbox"/> WIC	<input type="checkbox"/> Lifeline	<input type="checkbox"/> Public Housing or Section 8 Housing Asistencia de Vivienda / Programa de Vivienda bajo Sección 8	<input type="checkbox"/> Low-Income Home Energy Assistance Asistencia con Energía Eléctrica	<input type="checkbox"/> Community Care via HHS Ayuda Comunitaria bajo HHS	<input type="checkbox"/> LIS in Medicare ("Extra Help") Subsidio Adicional de Medicare bajo el Programa LIS	<input type="checkbox"/> Needs-based VA Pension Pensión para Veteranos de Guerra en función a necesidades	<input type="checkbox"/> Child Care Assistance under Child Care and Development Block Grant Asistencia con Guardería bajo el Programa CCDBG	<input type="checkbox"/> County Assistance, County Health Care, or General Assistance (GA) Asistencia del Condado, Asistencia Médica del Condado, o Asistencia General (GA)	<input checked="" type="checkbox"/> Other / Otros beneficios <u>MAP</u>	<input type="checkbox"/> Other / Otros beneficios
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5. What are your monthly income sources? ¿Cuáles son sus fuentes de ingresos mensuales?

➤ My **take-home** pay is \$ 1,876 in monthly wages.

Mi **pago neto** es \$ _____ en sueldo mensual.

➤ I work as a Social Worker (your job title) for Integral Care (your employer).

Yo trabajo como _____ (título de su puesto) para
 _____ (compañía o jefe).

➤ \$ 1,876 is my total **monthly** income / son mis ingresos totales **al mes**.

These are my income sources. Estas son mis fuentes de ingresos.

➤ \$ _____ in unemployment / en beneficios de desempleo.

I have been unemployed since _____ (date).

He estado desempleado desde _____ (indique fecha).

➤ \$ _____ in public benefits / en beneficios de Asistencia Pública.

➤ \$ _____ from people in my household other than my spouse / de ingresos de otras personas en mi hogar que no son de mi cónyuge.

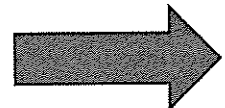
➤ \$ _____ from retirement or pension / de jubilación o pensión.

➤ \$ _____ from tips or bonus / de propinas o bonos.

➤ \$ _____ from disability / de discapacidad.

➤ \$ _____ from worker's comp / de compensación al trabajador.

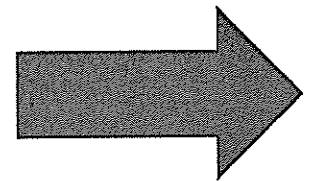
➤ \$ _____ from social security / de seguro social.



- \$_____ from military housing / de vivienda militar.
- \$_____ from dividends, interest, or royalties / de dividendos, intereses, o regalías.
- \$_____ from child or spousal support / de manutención de menores o manutención conyugal recibida.
- Answer only if your spouse is not your opponent. Responda tan sólo si su ccónyuge no es parte contraria en esta causa legal. \$_____ from my spouse's income / de ingresos de mi cónyuge.
- \$_____ from other jobs/sources of income / de otros trabajos/ fuentes de ingresos.

Describe / describa:

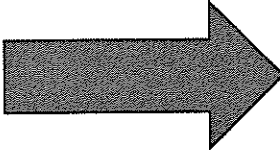
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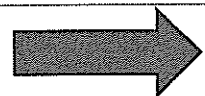
Pase a la siguiente página

6. What is the value of your assets or property? ¿Cuál es el valor de sus bienes o propiedades?

My property includes: Mis bienes incluyen:	Value / Valor The value is the amount the item would sell for less the amount you still owe on it, if anything. El valor de sus bienes es la cantidad por la que la propiedad o pertenencia se vendería, menos el monto que aún se adeuda, si lo hubiera.
➤ Cash Dinero en efectivo	\$
➤ Bank accounts, other financial assets Cuentas bancarias, otros bienes financieros	
	\$
	\$
	\$
➤ Cars and boats (make and year) Automóviles, lanchas (modelo y año)	
	\$
	\$
	\$
➤ Other property like jewelry, stocks, land, a second house. (Do not list your homestead.) Otros bienes como joyas, acciones, terrenos, una segunda casa. (No indique su hogar familiar.)	
	\$
	\$
	\$
Total Value of Property Valor Total de Sus Bienes	\$



7. What are your monthly expenses that are not deducted from your paycheck? ¿Cuáles son sus gastos mensuales que no son descontados de su cheque de sueldo?	
My monthly expenses are: Mis gastos mensuales son:	Amount Cantidad
➤ Rent/house payments; maintenance Alquiler/hipoteca; mantenimiento de casa	\$ 1,378
➤ Food and household supplies Alimentos y artículos para el hogar	\$
➤ Utilities and telephone Luz, gas, agua y teléfono	\$ 211
➤ Clothing and laundry Ropa y lavado de ropa	\$
➤ Medical and dental expenses Gastos médicos y dentales	\$
➤ Insurance (life, health, auto, etc.) Seguros (de vida, médico, de automóvil etc.)	\$
➤ School and childcare Escuelas y guarderías	\$
➤ Transportation, auto repair, gas Transportación, reparaciones de automóviles, gasolina	\$
➤ Child/Spousal support Manutención a Menores/Manutención Conyugal	\$
➤ Debt payments to (list): Pagos por deudas hechas a (indíquelos):	364
	\$
	\$
➤ Wages withheld by court order Sueldo retenido por orden judicial	\$
➤ Other expenses (list): Otros gastos (indíquelos):	
	\$
	\$
Total Monthly Expenses Gastos Totales Mensuales	\$ 1953



8. Are there debts or other facts explaining your financial situation?
¿Hay deudas u otros factores que expliquen su situación económica?

My debts include (list debt and amount owed):
Mis duedas incluyen (indique deuda y la cantidad que debe):

Credit Card	\$ 20,000
	\$
	\$
	\$
	\$

If you want the court to consider other facts, such as unusual medical expenses, family emergencies, etc., attach another page to this form labeled "Exhibit: Additional Supporting Facts."

Si usted desea que el tribunal considere otros factores, tales como gastos médicos excepcionales, emergencias familiares, etc., adjunte al formulario otra hoja con esta información y bajo el título, "Anexo: Información Adicional de Apoyo."

9. Ability to Pay Court Costs. Declaración sobre su Habilidad de Pagar Costas de Tribunal

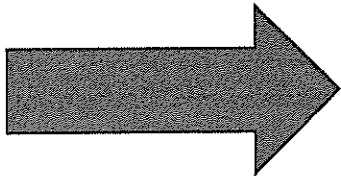
Check only one box. Seleccione tan solo una casilla.

☒ I cannot afford to pay court costs. No puedo pagar las costas de tribunal.

☐ I cannot furnish an appeal bond or pay a cash deposit to appeal a justice court decision, and I cannot afford to pay court costs.

No puedo aportar una fianza de apelación ni pagar un depósito en efectivo para apelar la decisión judicial de un magistrado, y no puedo pagar costas de tribunal.

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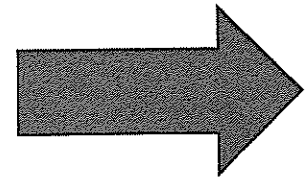
Pase a la siguiente página

10. Declaration/Affidavit. Declaración Escrita Bajo Juramento.

Fill out **only one** box. If you fill out the Declaration, you will not need to sign the form in front of a notary public. If you do not want to list your address for privacy or safety concerns, take the form and photo identification, and fill out the Affidavit box in front of a notary public.

Llene tan **solo una** opción. Si usted llena la Declaración, no necesitará firmar el formulario ante un notario. Si usted no quiere que aparezca su domicilio en el documento para conservar su privacidad o por motivos de su seguridad, lleve el formulario y una identificación con fotografía y llene la sección de la Declaración Escrita Bajo Juramento ante un Notario.

Go to next page



Pase a la siguiente página

Option 1 / Opción 1

Declaration: I declare under penalty of perjury that the foregoing is true and correct.

Declaración: Yo declaro bajo pena de perjurio que la información a continuación es correcta y verdadera.

➤ My name is / Mi nombre es

Vanessa Bisserehn

➤ My date of birth is / Mi fecha de nacimiento es

[REDACTED]

➤ My address is / Mi domicilio es

9606 Hansford Drive, Austin, TX, 78753, Travis

Street, city, zip, country

Calle y número, ciudad, estado, código postal, país

➤ Vanessa Bisserehn

Signature

Firma

➤ 10/10/2024

Date (month, day, year)

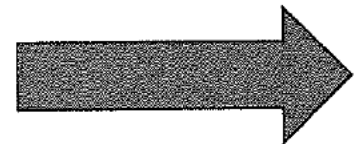
Fecha (mes, día, año)

➤ Travis, Texas

County, state

Condado, estado

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Pase a la siguiente página

Cause No. _____

VANESSA BISSERETH,	§	
	§	JUSTICE OF THE PEACE
<i>Plaintiff</i>	§	
	§	
v.	§	PRECINCT NO. 5
	§	
BANK OF AMERICA, N.A.,	§	
JAVITCH BLOCK, LLC,	§	TRAVIS COUNTY, TEXAS
	§	
<i>Defendants</i>	§	

CERTIFICATE OF LEGAL-AID PROVIDER IN SUPPORT OF STATEMENT OF INABILITY TO AFFORD PAYMENT OF COURT COSTS OR AN APPEAL BOND

Attorney Robert Zimmer states that the following is true and correct:

"I am a licensed attorney in and for the State of Texas. I am representing Plaintiff Vanessa Bissereth at no charge to her, due to the party’s inability to afford costs.

“I am providing free legal services directly from a program, Volunteer Legal Services of Central Texas (VLS) that is funded by the Texas Access to Justice Foundation (TAJF).

Respectfully submitted,

/s/ Robert Zimmer
By: Robert Zimmer
 State Bar No. 24098662

Zimmer & Associates, A Law Firm
 1108 Lavaca Street, Suite 110-187
 Austin, Texas 78701
 Telephone/Fax: (512) 434-0306
 zimmerlawTX@gmail.com

ATTORNEY FOR PLAINTIFF

Cause No. J5-CV-24-274397

VANESSA BISSERETH

Plaintiff/s

Vs

JAVITCH BLOCK, LLC; BANK OF AMERICA,
N.A.

Defendant/s

§
§
§
§
§
§
§

JUSTICE OF THE PEACE

PRECINCT FIVE

TRAVIS COUNTY, TEXAS

**ORDER ON THE PLAINTIFF'S STATEMENT OF INABILITY
TO AFFORD PAYMENT OF COSTS**

On this day came to be considered the Plaintiff's Statement of Inability to Afford Payment of Costs.

☐ It is ordered that a HEARING BE SET on Plaintiff's Statement of Inability to Afford Payment of Costs.

☒ The Court conditionally finds that the Plaintiff IS UNABLE TO AFFORD THE COSTS ASSOCIATED WITH THE CAUSE. It is therefore ordered that this cause be docketed as any other cause where filing fees were paid. The Court's finding may be revised at a future hearing contesting the Statement of Inability to Afford Payment of Costs.

SIGNED _____

11/27/2024 11:45:41 AM



Judge Rick "Rico" Olivo
Justice of the Peace, Precinct Five
Travis County, Texas



NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA
AVISO: ESTE DOCUMENTO CONTIENE INFORMACIÓN
CONFIDENCIAL



**Statement of Inability to Afford Payment
of Court Costs or an Appeal Bond**
**Declaración sobre Incapacidad de Pago de Costas
de Tribunal o de una Fianza de Apelación**

Cause Number
Número de Caso

J5-CV-24-274397

The Clerk's office will fill in the Cause Number when you file this form.

El Secretario del Tribunal anotará el Número de Caso cuando usted presente este formulario.

Vanessa Bissereth
v.
Bank of America, N.A. and
Javitch Block, LLC

Copy information listed at the top left of
the petition here.

Copie aquí la información ubicada en la
parte superior izquierda del escrito de la
demanda.

Copy information listed at the top right of the petition here.

Copie aquí la información ubicada en la parte superior derecha del escrito de la
demanda.

Justice of the Peace Court, Precinct #5

Court Number
Número del Tribunal

Travis, Texas
County
Condado

- ☐ District Court
Tribunal de Distrito
- ☐ County Court
Tribunal del Condado
- ☐ County Court at Law
Tribunal Estatutario
- ☒ Justice Court
Juzgado de Paz
- ☐ Probate Court
Juzgado Sucesorio

1. Your Information / Su Información

- My full legal name is / Mi nombre legal completo es

Vanessa Bissereh

First Middle Last / Nombre de Pila Segundo Nombre Apellido

- My date of birth is / Mi fecha de nacimiento es

[REDACTED]

Month Day Year / Mes Día Año

- My address is / Mi dirección es

Home / Domicilio 9606 Hansford Dr.

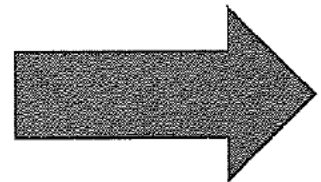
Mailing / Dirección Postal Austin, TX, 78753

- My phone number / Mi número telefónico [REDACTED] 4683

- My email I check often / Mi correo electrónico que reviso con frecuencia

[REDACTED]@icloud.com

Go to next page



Pase a la siguiente página

2. About My Dependents / Mis Dependientes

“The people who depend on me financially are listed below.” **Use initials only for children under 18.** If needed, attach a separate piece of paper to list more dependents.

“Las personas a continuación dependen económicamente de mí.” **Use iniciales para los menores de 18 años** y, si es necesario, anexe una hoja por separado para enumerar a todos sus dependientes.

Name Nombre	Age Edad	Relationship to me Parentesco Conmigo

3. Are you represented by Legal Aid? ¿Está siendo representado por alguna entidad de asistencia legal?

Check only one box. Seleccione solo una casilla.

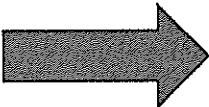
☒ I am being represented in this case for free by an attorney who works for a legal aid provider or who received my case through a legal aid provider. I have attached the certificate the legal aid provider gave me as “Exhibit: Legal Aid Certificate.”

Me está representando gratuitamente un abogado que trabaja para una entidad de asistencia legal o que recibió mi caso de una entidad de asistencia legal. El certificado que la entidad de asistencia legal me entregó lo adjunto bajo el título, “Anexo: Certificado de Asistencia Legal.”

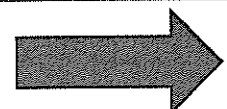
or / o

☐ I am not represented by legal aid.

No me está representando ninguna entidad de asistencia legal.



4. Public Benefits / Beneficios de Asistencia Pública																	
<p>➤ Do you or any of your dependents receive public benefits? <i>¿Recibe usted o sus dependientes beneficios de asistencia pública?</i></p> <p><input checked="" type="checkbox"/> Yes / <i>Sí</i> <input type="checkbox"/> No / <i>No</i></p>																	
<p>➤ If you answered yes, check all that apply and attach proof to this form, such as a copy of an eligibility form or check.</p> <p>Si respondió con un Sí, marque todas las casillas que apliquen y adjunte a este formulario comprobantes, tales como una copia de la carta autorizando que reciba estos beneficios o una copia del cheque que recibe.</p> <table border="0"> <tr> <td><input type="checkbox"/> Food stamps/SNAP Cupones de comida/SNAP</td> <td><input type="checkbox"/> TANF</td> </tr> <tr> <td><input type="checkbox"/> Medicaid</td> <td><input type="checkbox"/> CHIP</td> </tr> <tr> <td><input type="checkbox"/> SSI/SSDI</td> <td><input type="checkbox"/> WIC</td> </tr> <tr> <td><input type="checkbox"/> Lifeline</td> <td><input type="checkbox"/> Public Housing or Section 8 Housing Asistencia de Vivienda / Programa de Vivienda bajo Sección 8</td> </tr> <tr> <td><input type="checkbox"/> Low-Income Home Energy Assistance Asistencia con Energía Eléctrica</td> <td><input type="checkbox"/> Community Care via HHS Ayuda Comunitaria bajo HHS</td> </tr> <tr> <td><input type="checkbox"/> LIS in Medicare ("Extra Help") Subsidio Adicional de Medicare bajo el Programa LIS</td> <td><input type="checkbox"/> Needs-based VA Pension Pensión para Veteranos de Guerra en función a necesidades</td> </tr> <tr> <td><input type="checkbox"/> Child Care Assistance under Child Care and Development Block Grant Asistencia con Guardería bajo el Programa CCDBG</td> <td><input type="checkbox"/> County Assistance, County Health Care, or General Assistance (GA) Asistencia del Condado, Asistencia Médica del Condado, o Asistencia General (GA)</td> </tr> <tr> <td><input checked="" type="checkbox"/> Other / Otros beneficios <u>MAP</u></td> <td><input type="checkbox"/> Other / Otros beneficios</td> </tr> </table>		<input type="checkbox"/> Food stamps/SNAP Cupones de comida/SNAP	<input type="checkbox"/> TANF	<input type="checkbox"/> Medicaid	<input type="checkbox"/> CHIP	<input type="checkbox"/> SSI/SSDI	<input type="checkbox"/> WIC	<input type="checkbox"/> Lifeline	<input type="checkbox"/> Public Housing or Section 8 Housing Asistencia de Vivienda / Programa de Vivienda bajo Sección 8	<input type="checkbox"/> Low-Income Home Energy Assistance Asistencia con Energía Eléctrica	<input type="checkbox"/> Community Care via HHS Ayuda Comunitaria bajo HHS	<input type="checkbox"/> LIS in Medicare ("Extra Help") Subsidio Adicional de Medicare bajo el Programa LIS	<input type="checkbox"/> Needs-based VA Pension Pensión para Veteranos de Guerra en función a necesidades	<input type="checkbox"/> Child Care Assistance under Child Care and Development Block Grant Asistencia con Guardería bajo el Programa CCDBG	<input type="checkbox"/> County Assistance, County Health Care, or General Assistance (GA) Asistencia del Condado, Asistencia Médica del Condado, o Asistencia General (GA)	<input checked="" type="checkbox"/> Other / Otros beneficios <u>MAP</u>	<input type="checkbox"/> Other / Otros beneficios
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<input checked="" type="checkbox"/> Other / Otros beneficios <u>MAP</u>	<input type="checkbox"/> Other / Otros beneficios																



5. What are your monthly income sources? ¿Cuáles son sus fuentes de ingresos mensuales?

➤ My **take-home** pay is \$ 1,876 in monthly wages.

Mi **pago neto** es \$ _____ en sueldo mensual.

➤ I work as a Social Worker (your job title) for Integral Care (your employer).

Yo trabajo como _____ (título de su puesto) para
 _____ (compañía o jefe).

➤ \$ 1,876 is my total **monthly** income / son mis ingresos totales **al mes**.

These are my income sources. Estas son mis fuentes de ingresos.

➤ \$ _____ in unemployment / en beneficios de desempleo.

I have been unemployed since _____ (date).

He estado desempleado desde _____ (indique fecha).

➤ \$ _____ in public benefits / en beneficios de Asistencia Pública.

➤ \$ _____ from people in my household other than my spouse / de ingresos de otras personas en mi hogar que no son de mi cónyuge.

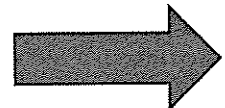
➤ \$ _____ from retirement or pension / de jubilación o pensión.

➤ \$ _____ from tips or bonus / de propinas o bonos.

➤ \$ _____ from disability / de discapacidad.

➤ \$ _____ from worker's comp / de compensación al trabajador.

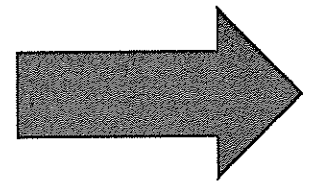
➤ \$ _____ from social security / de seguro social.



- \$_____ from military housing / de vivienda militar.
- \$_____ from dividends, interest, or royalties / de dividendos, intereses, o regalías.
- \$_____ from child or spousal support / de manutención de menores o manutención conyugal recibida.
- Answer only if your spouse is not your opponent. Responda tan sólo si su ccónyuge no es parte contraria en esta causa legal. \$_____ from my spouse's income / de ingresos de mi cónyuge.
- \$_____ from other jobs/sources of income / de otros trabajos/ fuentes de ingresos.

Describe / describa:

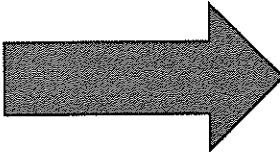
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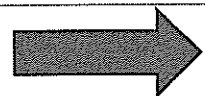
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6. What is the value of your assets or property? ¿Cuál es el valor de sus bienes o propiedades?

My property includes: Mis bienes incluyen:	Value / Valor The value is the amount the item would sell for less the amount you still owe on it, if anything. El valor de sus bienes es la cantidad por la que la propiedad o pertenencia se vendería, menos el monto que aún se adeuda, si lo hubiera.
➤ Cash Dinero en efectivo	\$
➤ Bank accounts, other financial assets Cuentas bancarias, otros bienes financieros	
	\$
	\$
	\$
➤ Cars and boats (make and year) Automóviles, lanchas (modelo y año)	
	\$
	\$
	\$
➤ Other property like jewelry, stocks, land, a second house. (Do not list your homestead.) Otros bienes como joyas, acciones, terrenos, una segunda casa. (No indique su hogar familiar.)	
	\$
	\$
	\$
Total Value of Property Valor Total de Sus Bienes	\$



7. What are your monthly expenses that are not deducted from your paycheck? ¿Cuáles son sus gastos mensuales que no son descontados de su cheque de sueldo?	
My monthly expenses are: Mis gastos mensuales son:	Amount Cantidad
➤ Rent/house payments; maintenance Alquiler/hipoteca; mantenimiento de casa	\$ 1,378
➤ Food and household supplies Alimentos y artículos para el hogar	\$
➤ Utilities and telephone Luz, gas, agua y teléfono	\$ 211
➤ Clothing and laundry Ropa y lavado de ropa	\$
➤ Medical and dental expenses Gastos médicos y dentales	\$
➤ Insurance (life, health, auto, etc.) Seguros (de vida, médico, de automóvil etc.)	\$
➤ School and childcare Escuelas y guarderías	\$
➤ Transportation, auto repair, gas Transportación, reparaciones de automóviles, gasolina	\$
➤ Child/Spousal support Manutención a Menores/Manutención Conyugal	\$
➤ Debt payments to (list): Pagos por deudas hechas a (indíquelos):	364
	\$
	\$
➤ Wages withheld by court order Sueldo retenido por orden judicial	\$
➤ Other expenses (list): Otros gastos (indíquelos):	
	\$
	\$
Total Monthly Expenses Gastos Totales Mensuales	\$ 1953



8. Are there debts or other facts explaining your financial situation?

¿Hay deudas u otros factores que expliquen su situación económica?

My debts include (list debt and amount owed):

Mis duedas incluyen (indique deuda y la cantidad que debe):

Credit Card	\$ 20,000
	\$
	\$
	\$
	\$

If you want the court to consider other facts, such as unusual medical expenses, family emergencies, etc., attach another page to this form labeled "Exhibit: Additional Supporting Facts."

Si usted desea que el tribunal considere otros factores, tales como gastos médicos excepcionales, emergencias familiares, etc., adjunte al formulario otra hoja con esta información y bajo el título, "Anexo: Información Adicional de Apoyo."

9. Ability to Pay Court Costs. Declaración sobre su Habilidad de Pagar Costas de Tribunal

Check only one box. Seleccione tan solo una casilla.

☒ I cannot afford to pay court costs. No puedo pagar las costas de tribunal.

☐ I cannot furnish an appeal bond or pay a cash deposit to appeal a justice court decision, and I cannot afford to pay court costs.

No puedo aportar una fianza de apelación ni pagar un depósito en efectivo para apelar la decisión judicial de un magistrado, y no puedo pagar costas de tribunal.

Go to next page

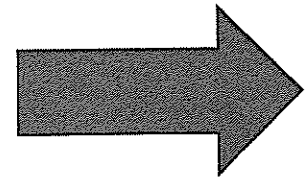
Pase a la siguiente página

10. Declaration/Affidavit. Declaración Escrita Bajo Juramento.

Fill out **only one** box. If you fill out the Declaration, you will not need to sign the form in front of a notary public. If you do not want to list your address for privacy or safety concerns, take the form and photo identification, and fill out the Affidavit box in front of a notary public.

Llene tan **solo una** opción. Si usted llena la Declaración, no necesitará firmar el formulario ante un notario. Si usted no quiere que aparezca su domicilio en el documento para conservar su privacidad o por motivos de su seguridad, lleve el formulario y una identificación con fotografía y llene la sección de la Declaración Escrita Bajo Juramento ante un Notario.

Go to next page



Pase a la siguiente página

Option 1 / Opción 1

Declaration: I declare under penalty of perjury that the foregoing is true and correct.

Declaración: Yo declaro bajo pena de perjurio que la información a continuación es correcta y verdadera.

➤ My name is / Mi nombre es

Vanessa Bisserehn

➤ My date of birth is / Mi fecha de nacimiento es

[REDACTED]

➤ My address is / Mi domicilio es

9606 Hansford Drive, Austin, TX, 78753, Travis

Street, city, zip, country

Calle y número, ciudad, estado, código postal, país

➤ Vanessa Bisserehn

Signature

Firma

➤ 10/10/2024

Date (month, day, year)

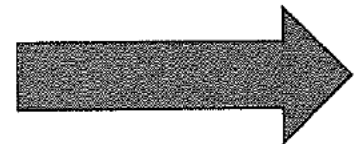
Fecha (mes, día, año)

➤ Travis, Texas

County, state

Condado, estado

Go to next page



Pase a la siguiente página

Cause No. J5-CV-24-274397

VANESSA BISSERETH,

Plaintiff

v.

BANK OF AMERICA, N.A.,
 JAVITCH BLOCK, LLC,

Defendants

§
§
§
§
§
§
§
§
§
§

JUSTICE OF THE PEACE

PRECINCT NO. 5

TRAVIS COUNTY, TEXAS

CERTIFICATE OF LEGAL-AID PROVIDER IN SUPPORT OF STATEMENT OF INABILITY TO AFFORD PAYMENT OF COURT COSTS OR AN APPEAL BOND

Attorney Robert Zimmer states that the following is true and correct:

"I am a licensed attorney in and for the State of Texas. I am representing Plaintiff Vanessa Bissereth at no charge to her, due to the party's inability to afford costs.

"I am providing free legal services directly from a program, Volunteer Legal Services of Central Texas (VLS) that is funded by the Texas Access to Justice Foundation (TAJF).

Respectfully submitted,

/s/ Robert Zimmer

By: Robert Zimmer
 State Bar No. 24098662

Zimmer & Associates, A Law Firm
 1108 Lavaca Street, Suite 110-187
 Austin, Texas 78701
 Telephone/Fax: (512) 434-0306
 zimmerlawTX@gmail.com

ATTORNEY FOR PLAINTIFF

Alex Quezada

From: Zimmer & Associates Paralegal <paralegal@zimmerlawtx.com>
Sent: Friday, December 13, 2024 1:35 PM
To: jp5civil
Cc: Robert Zimmer
Subject: [CAUTION EXTERNAL] re: J5-CV-24-274397 - Plaintiff's Affidavit of Inability to Pay

CAUTION: This email is from OUTSIDE Travis County. Links or attachments may be dangerous. Click the Phish Alert button above if you think this email is malicious.

Good afternoon,

We represent the Plaintiff, Vanessa Bissereth, in the above captioned case (J5-CV-24-274397). On November 20th we filed the Plaintiff's Affidavit of Inability to Pay and are still awaiting it to be granted.

We're confused because we filed a different lawsuit (J5-CV-24-274391) for the same Plaintiff on the same day and had that case's Affidavit of Inability to Pay granted a week later. Could you please update us on the status of this?

Best,

--

Zachary Evans

Paralegal

paralegal@zimmerlawtx.com

(M): (512) 643-0280 | (F): 210 982 0596

Zimmer & Associates

1108 Lavaca Street

Suite 110-187

Austin, TX 78701

zimmerlawtx.com [zimmerlawtx.com]

JUSTICE CIVIL CITATION

THE STATE OF TEXAS

**TO: BANK OF AMERICA, N.A.
ATTN CT CORPORATION SYSTEM
160 MINE LAKE CT STE 200
RALEIGH NC 27615**

YOU HAVE BEEN SUED. You may employ an attorney to help you in defending against this lawsuit, but you are not required to employ an attorney. You or your attorney must file an answer with the court. Your answer is due by the end of the 14th day after the day you were served with these papers. If the 14th day is a Saturday, Sunday, or legal holiday, your answer is due by the end of the first day following the 14th day that is not a Saturday, Sunday, or legal holiday. Do not ignore these papers. If you do not file an answer by the due date, a default judgment may be taken against you. For further information, consult Part V of the Texas Rules of Civil Procedure, which is available online and also at the court listed on this citation.

YOUR WRITTEN RESPONSE to this lawsuit shall be filed in Justice of the Peace, Precinct Five, at 1000 Guadalupe Street Room 117, Austin, Texas 78701. E-mail JP5civil@traviscountytexas.gov. Phone # (512) 854-9050. A copy of your written response or any other document you file with the court must be served on all other parties. Proof of service must be evidenced by a certificate of service attached to the document filed with the Court. Please consult Texas Rules of Civil Procedure, Rule 501.4 for additional information.

THE LAW PROHIBITS THE JUDGE & THE CLERKS FROM GIVING LEGAL ADVICE, SO PLEASE DO NOT SEEK SUCH ADVICE FROM THIS OFFICE. ANY QUESTIONS YOU HAVE SHOULD BE DIRECTED TO AN ATTORNEY.

Your cause number is **J5-CV-24-274397**, case styled

VANESSA BISSERETH, Plaintiff/s vs.

JAVITCH BLOCK, LLC; BANK OF AMERICA, N.A., Defendant/s

was filed in the Justice Court, Precinct Five, on November 20, 2024.

Issued and given under my hand on December 17, 2024.




Judge Rick "Rico" Olivo
Justice of the Peace, Pct. 5
1000 Guadalupe Street #117
Austin, Texas 78701

Plaintiff / Plaintiff Attorney / Plaintiff Agent (if applicable):

ROBERT ZIMMER

1108 LAVACA STREET SUITE 110-187

AUSTIN TX 78701

<<<<<SEE PETITION FOR TELEPHONE NUMBER>>>>>

-----OFFICER'S RETURN-----

Came to the hand on the _____ day of _____, 20____ at _____ o'clock____. M.
Executed at _____ within County of _____ at _____ o'clock____. M. on the
_____ day of _____, 20____, by delivering to the within named _____

a true copy of this citation together with the accompanying copy of the petition having first attached such copy of such petition to such copy of citation and endorsed on such copy of citation the date of delivery.

To certify which witness my hand officially: _____

SERVICE FEE \$ _____ of _____ County, Texas

By Deputy _____

STATEMENT OF INABILITY TO AFFORD PAYMENT OF COURT COSTS

JUSTICE CIVIL CITATION

THE STATE OF TEXAS

TO: JAVITCH BLOCK, LLC
ATTN CORPORATE CENTER ONE
5301 SOUTHWEST PKWY STE 400
AUSTIN TX 78735

YOU HAVE BEEN SUED. You may employ an attorney to help you in defending against this lawsuit, but you are not required to employ an attorney. You or your attorney must file an answer with the court. Your answer is due by the end of the 14th day after the day you were served with these papers. If the 14th day is a Saturday, Sunday, or legal holiday, your answer is due by the end of the first day following the 14th day that is not a Saturday, Sunday, or legal holiday. Do not ignore these papers. If you do not file an answer by the due date, a default judgment may be taken against you. For further information, consult Part V of the Texas Rules of Civil Procedure, which is available online and also at the court listed on this citation.

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Your cause number is **J5-CV-24-274397**, case styled

VANESSA BISSERETH, Plaintiff/s vs.

JAVITCH BLOCK, LLC; BANK OF AMERICA, N.A., Defendant/s

was filed in the Justice Court, Precinct Five, on November 20, 2024.

Issued and given under my hand on December 17, 2024.




Judge Rick "Rico" Olivo
 Justice of the Peace, Pct. 5
 1000 Guadalupe Street #117
 Austin, Texas 78701

Plaintiff / Plaintiff Attorney / Plaintiff Agent (if applicable):

ROBERT ZIMMER
 1108 LAVACA STREET SUITE 110-187
 AUSTIN TX 78701

<<<<<SEE PETITION FOR TELEPHONE NUMBER>>>>>

-----OFFICER'S RETURN-----

Came to the hand on the _____ day of _____, 20____ at _____ o'clock _____. M.
 Executed at _____ within County of _____ at _____ o'clock _____. M. on the
 _____ day of _____, 20____, by delivering to the within named _____

a true copy of this citation together with the accompanying copy of the petition having first attached such copy of such petition to such copy of citation and endorsed on such copy of citation the date of delivery.

To certify which witness my hand officially: _____
 SERVICE FEE \$ _____ of _____ County, Texas
 By Deputy _____

STATEMENT OF INABILITY TO AFFORD PAYMENT OF COURT COSTS

CAUSE NO. J5-CV-24-274397

VANESSA BISSERETH,	§	IN THE JUSTICE COURT
	§	
Plaintiff,	§	
v.	§	PRECINCT NO. 5
	§	
BANK OF AMERICA, N.A.,	§	
and JAVITCH BLOCK, LLC,	§	TRAVIS COUNTY, TEXAS
	§	
Defendants.	§	

DEFENDANT’S ORIGINAL ANSWER

Defendants, Bank of America, N.A. and Javitch Block, LLC (hereinafter “Defendants”), files this original answer to *Plaintiff’s Original Petition*.

A. GENERAL DENIAL

1. Defendants generally deny the allegations in plaintiff’s original petition.

B. PRAYER

2. For these reasons, Defendants asks the court to enter judgment that Plaintiff take nothing, assess costs against Plaintiff, and award Defendants all other relief to which they are entitled

DEFENDANTS BY COUNSEL,

/s/ Tyler G. Lansde006E

Tyler G. Lansden, #24118207
 Javitch Block LLC
 275 W. Campbell, Suite 312
 Richardson, TX 75080
 (214) 383-9088
 DAL@jbllc.com
 Fax: (214) 383-5890
Counsel for Defendants

CERTIFICATE OF SERVICE

I certify that the foregoing instrument was served in compliance with Tex. R. Civ. P. 21 and 21a on December 30, 2024 to all known counsel and parties of record.

- ☐ via regular mail
- ☐ via certified mail # _____
- ☐ via facsimile at fax # _____
- ☒ via E-Service zimmerlawTX@gmail.com
- ☐ via overnight delivery tracking # _____
- ☐ via hand delivery _____

/s/ Tyler G. Lansden

Tyler G. Lansden, #24118207
Javitch Block LLC
275 W. Campbell, Suite 312
Richardson, TX 75080
(214) 383-9088
DAL@jblc.com
Fax: (214) 383-5890

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Javitch Block on behalf of Tyler Lansden

Bar No. 24118207

processing@jbandr.com

Envelope ID: 95706631

Filing Code Description: Answer

Filing Description: Defendants' Original Answer / MB

Status as of 12/30/2024 2:15 PM CST

Associated Case Party: Javitch Block, LLC

Name	BarNumber	Email	TimestampSubmitted	Status
Tyler Lansden		tlansden@jblc.com	12/30/2024 10:33:05 AM	SENT

Associated Case Party: Vanessa Bissereth

Name	BarNumber	Email	TimestampSubmitted	Status
Zimmer Law		zimmerlawTX@gmail.com	12/30/2024 10:33:05 AM	SENT

NO. J5-CV-24-274397

VANESSA BISSERETH, <i>Plaintiff</i>	§	IN THE JUSTICE COURT
	§	
	§	
VS.	§	PRECINCT NO. 5
	§	
BANK OF AMERICA, N.A., and JAVITCH BLOCK, LLC, <i>Defendant</i>	§	TRAVIS COUNTY, TEXAS
	§	
	§	

**PLAINTIFF’S MOTION TO ALLOW DISCOVERY and
 APPLY THE TEXAS RULES OF EVIDENCE
 AS TO DEFENDANT JAVITCH BLOCK, LLC**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Plaintiff VANESSA BISSERETH (“Bissereth”) and files this, her Motion to Allow Discovery as to Defendant JAVITCH BLOCK, LLC (“Javitch Block”) , and to Apply the Texas Rules of Evidence to the instant case, and in support, respectfully shows this Court as follows:

PROPOSED DISCOVERY

Rule 500.9 limits pretrial discovery that the court considers reasonable and necessary. Plaintiff Vanessa Bissereth’s proposed discovery, attached as Exhibit ‘A’, is limited to that which is both reasonable and necessary to prove her claims against Defendant Javitch Block, LLC, afford Javitch Block, LLC an opportunity to defend against Plaintiff’s claims.

THE COURT SHOULD APPLY THE RULES OF EVIDENCE

A justice court may apply the Rules of Evidence pursuant to Rule 500.3(e) when the court determines the rules are necessary to a fair trial. Here, Plaintiff asks that the Court level

the playing field between the parties by simply applying all the Rules of Evidence to assure a fair trial with due process.

The court should apply all the Texas Rules of Evidence, but at a minimum, the Texas Rules of Evidence Rules 401, 402, 408 (relevance) 602, 603 (witnesses), 701, 702 and 703 (opinions), 801, 802, 803(6) (hearsay), 902(10) (authentication) and 1001, 1002 and 1003 (best evidence rule).

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff Vanessa Bissereth prays that the Court:

- Grant her motion, and permit Stephenson to serve the proposed discovery on Defendant Javitch Block, LLC;
- Apply the Rules of Evidence to the instant case;
- Grant Bissereth all other relief to which the Court may find her entitled, at law or in equity.

Respectfully submitted,

/s/ Robert Zimmer

Robert Zimmer, Esq.

Zimmer & Associates, A Law Firm
1108 Lavaca Street, Suite 110-187
Austin, TX 78701
Phone/Fax: (512) 434-0306
zimmerlawTX@gmail.com

**ATTORNEY FOR PLAINTIFF,
VANESSA BISSERETH**

EXHIBIT "A"

NO. J5-CV-24-274397

VANESSA BISSERETH, <i>Plaintiff</i>	§	IN THE JUSTICE COURT
	§	
	§	
VS.	§	PRECINCT NO. 5
	§	
BANK OF AMERICA, N.A., and JAVITCH BLOCK, LLC, <i>Defendant</i>	§	TRAVIS COUNTY, TEXAS
	§	
	§	

**PLAINTIFF'S FIRST SET OF DISCOVERY REQUESTS
TO DEFENDANT JAVITCH BLOCK, LLC**

TO: DEFENDANT Javitch Block, LLC., c/o its counsel, Tyler Lansden, Esq. via e-mail:
 tlansden@jblc.com.

FROM: PLAINTIFF Vanessa Bissereth, by and through her attorney, Robert Zimmer,
 Esq., zimmerlawTX@gmail.com.

Plaintiff hereby serves and propounds her First Set of Discovery Requests on Defendant.

Please furnish, within 30 days after service of these Discovery Requests:

- (1) the correct name of the Defendant in this lawsuit;
- (2) the name, address, and telephone number of any potential Defendant(s);
- (3) the legal theories and, in general, the factual bases of Defendant's defenses (Defendant need not marshal all evidence that may be offered at trial);
- (4) the name, address, and telephone number of persons known to the Defendant who may have knowledge of relevant facts, and a brief statement of each identified person's connection with the case;
- (5) a copy - or a description by category and location - of all documents, electronically stored information, and tangible things that Defendant has in its possession, custody, or control, and may use to support its defenses, unless the use would be solely for impeachment;

- (6) any indemnity and insuring agreements described in Rule 192.3(f);
- (7) any settlement agreements described in Rule 192.3(g);
- (8) any witness statements described in Rule 192.3(h);
- (9) the name, address, and telephone number of any person who may be designated as a responsible third party.
- (10) The names of any testifying experts and the information as provided in Tex. R. Civ. P. 195.
- (11) The name, address, and telephone number of each witness –separately identifying those that Defendant expects to present and those it may call if the need arises.

Sincerely,

/s/ Robert Zimmer
Robert Zimmer, Esq.

Zimmer & Associates, A Law Firm
1108 Lavaca Street, Suite 110-187
Austin, TX 78701
Phone/Fax: (512) 434-0306
zimmerlawTX@gmail.com

**ATTORNEY FOR PLAINTIFF,
VANESSA BISSERETH**

CERTIFICATE OF SERVICE

I, the undersigned individual, hereby certify that a true and correct copy of the foregoing motion, exhibit, and proposed order, have been served on all parties, VIA E-FILE, on December 30, 2024

Respectfully submitted,

/s/ Robert Zimmer
Robert Zimmer, Esq.

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Robert Zimmer, Esq. on behalf of Robert Zimmer

Bar No. 24098662

zimmerlawtx@gmail.com

Envelope ID: 95725350

Filing Code Description: Motion for Discovery

Filing Description: Plaintiff's Motion to Allow Discovery as to Defendant

Javitch Block, LLC, and to Apply the Rules of Evidence / MB

Status as of 12/31/2024 8:16 AM CST

Associated Case Party: Vanessa Bissereth

Name	BarNumber	Email	TimestampSubmitted	Status
Zimmer Law		zimmerlawTX@gmail.com	12/30/2024 3:04:27 PM	SENT

Associated Case Party: Javitch Block, LLC

Name	BarNumber	Email	TimestampSubmitted	Status
Tyler Lansden		tlansden@jblc.com	12/30/2024 3:04:27 PM	SENT

NO. J5-CV-24-274397

VANESSA BISSERETH, <i>Plaintiff</i>	§	IN THE JUSTICE COURT
	§	
	§	
VS.	§	PRECINCT NO. 5
	§	
BANK OF AMERICA, N.A., and JAVITCH BLOCK, LLC, <i>Defendant</i>	§	TRAVIS COUNTY, TEXAS
	§	
	§	

**ORDER GRANTING PLAINTIFF'S MOTION TO ALLOW DISCOVERY
AS TO DEFENDANT JAVITCH BLOCK, LLC,
AND APPLY THE TEXAS RULES OF EVIDENCE**

On _____, 2024, the Court considered Plaintiff’s Motion to Allow Discovery and to Apply the Texas Rules of Evidence (“TRE”) to the instant case. After considering the motion, the response if any, the pleadings and evidence on file and the arguments of counsel, the Court rules as follows:

_____ Plaintiff’s Motion to Allow Discovery is GRANTED and Plaintiff may serve the proposed discovery that was attached to the motion as Exhibit ‘A’.

Plaintiffs’ Motion to Apply the TRE is GRANTED as follows:

_____ All of the Texas Rules of Evidence shall apply.

OR:

_____ TRE Rules 401, 402, 408 (relevance) 602, 603 (witnesses) shall apply.

_____ TRE Rules 701, 702 and 703 (opinions) shall apply.

_____ TRE Rules 801, 802, 803(6)(hearsay) shall apply.

____ TRE Rules 1001, 1002 and 1003 (best evidence rule) shall apply.

____ TRE Rule 902(10) (business records authentication) shall apply.

DATE: _____, 2024.

JUDGE PRESIDING,
Justice of the Peace Court,
Precinct 5
Travis County, Texas

BAS/M/AG

JUSTICE CIVIL CITATION

THE STATE OF TEXAS

TO: JAVITCH BLOCK, LLC
 ATTN CORPORATE CENTER ONE
 5301 SOUTHWEST PKWY STE 400
 AUSTIN TX 78735

YOU HAVE BEEN SUED. You may employ an attorney to help you in defending against this lawsuit, but you are not required to employ an attorney. You or your attorney must file an answer with the court. Your answer is due by the end of the 14th day after the day you were served with these papers. If the 14th day is a Saturday, Sunday, or legal holiday, your answer is due by the end of the first day following the 14th day that is not a Saturday, Sunday, or legal holiday. Do not ignore these papers. If you do not file an answer by the due date, a default judgment may be taken against you. For further information, consult Part V of the Texas Rules of Civil Procedure, which is available online and also at the court listed on this citation.

YOUR WRITTEN RESPONSE to this lawsuit shall be filed in Justice of the Peace, Precinct Five, at 1000 Guadalupe Street Room 117, Austin, Texas 78701. E-mail JP5civil@traviscountytexas.gov. Phone # (512) 854-9050. A copy of your written response or any other document you file with the court must be served on all other parties. Proof of service must be evidenced by a certificate of service attached to the document filed with the Court. Please consult Texas Rules of Civil Procedure, Rule 501.4 for additional information.

THE LAW PROHIBITS THE JUDGE & THE CLERKS FROM GIVING LEGAL ADVICE, SO PLEASE DO NOT SEEK SUCH ADVICE FROM THIS OFFICE. ANY QUESTIONS YOU HAVE SHOULD BE DIRECTED TO AN ATTORNEY.

Your cause number is **J5-CV-24-274397**, case styled

VANESSA BISSERETH, Plaintiff/s vs.

JAVITCH BLOCK, LLC; BANK OF AMERICA, N.A., Defendant/s

was filed in the Justice Court, Precinct Five, on November 20, 2024.

Issued and given under my hand on December 17, 2024.

zimmer lawTX@gmail.com

(512) 434-0306P

Plaintiff / Plaintiff Attorney / Plaintiff Agent (if applicable):

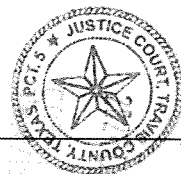
ROBERT ZIMMER

1108 LAVACA STREET SUITE 110-187

AUSTIN TX 78701

<<<<<SEE PETITION FOR TELEPHONE NUMBER>>>>>

Judge Rick "Rico" Olivo
 Justice of the Peace, Pct. 5
 1000 Guadalupe Street #117
 Austin, Texas 78701



-----OFFICER'S RETURN-----

Came to the hand on the 17 day of DECEMBER, 2024 at 9:49 o'clock A. M.
 Executed at 5301 Southwest Parkway within County of TRAVIS at 2:05 o'clock P. M. on the
23 day of DECEMBER, 2024, by delivering to the within named JAVITCH BLOCK LLC by
delivering in person to ALVIN SAYRE AT REGISTERED AGENTS SOLUTIONS, INC AT
5301 Southwest Parkway Suite 400 Austin Texas 78735
 a true copy of this citation together with the accompanying copy of the petition having first attached such copy of
 such petition to such copy of citation and endorsed on such copy of citation the date of delivery.

To certify which witness my hand officially:

SERVICE FEE \$ _____ of _____ County, Texas
 By Deputy Bobby Gutierrez

STATEMENT OF INABILITY TO AFFORD PAYMENT OF COURT COSTS

Vanessa Bissereth

Plaintiff/s

vs

Javitch Block, LLC; Bank of America, N.A.
Defendant/s

§
§
§
§
§
§
§

JUSTICE OF THE PEACE

Precinct Five

TRAVIS COUNTY, TEXAS

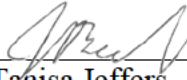
ORDER _____

Plaintiff's Motion for Discovery is GRANTED.

Plaintiff's Motion to Apply the Rules of Evidence is DENIED.

SIGNED 1/7/2025.

Judge John H. Beeler, Visiting Judge for
Judge Tanisa Jeffers
Justice of the Peace, Precinct 5
Travis County, Texas


Judge Tanisa Jeffers
Justice of the Peace, Precinct Five
Travis County, Texas



JUDGE'S REMARKS:

DATE _____

Judge Tanisa Jeffers
Justice of the Peace, Precinct Five
Travis County, Texas

NO. J5-CV-24-274397

VANESSA BISSERETH, <i>Plaintiff</i>	§	IN THE JUSTICE COURT
	§	
	§	
VS.	§	PRECINCT NO. 5
	§	
BANK OF AMERICA, N.A., and JAVITCH BLOCK, LLC, <i>Defendant</i>	§	TRAVIS COUNTY, TEXAS
	§	
	§	

**PLAINTIFF’S MOTION TO ALLOW DISCOVERY and
 APPLY THE TEXAS RULES OF EVIDENCE
 AS TO DEFENDANT JAVITCH BLOCK, LLC**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Plaintiff VANESSA BISSERETH (“Bissereth”) and files this, her Motion to Allow Discovery as to Defendant JAVITCH BLOCK, LLC (“Javitch Block”) , and to Apply the Texas Rules of Evidence to the instant case, and in support, respectfully shows this Court as follows:

PROPOSED DISCOVERY

Rule 500.9 limits pretrial discovery that the court considers reasonable and necessary. Plaintiff Vanessa Bissereth’s proposed discovery, attached as Exhibit ‘A’, is limited to that which is both reasonable and necessary to prove her claims against Defendant Javitch Block, LLC, afford Javitch Block, LLC an opportunity to defend against Plaintiff’s claims.

THE COURT SHOULD APPLY THE RULES OF EVIDENCE

A justice court may apply the Rules of Evidence pursuant to Rule 500.3(e) when the court determines the rules are necessary to a fair trial. Here, Plaintiff asks that the Court level

the playing field between the parties by simply applying all the Rules of Evidence to assure a fair trial with due process.

The court should apply all the Texas Rules of Evidence, but at a minimum, the Texas Rules of Evidence Rules 401, 402, 408 (relevance) 602, 603 (witnesses), 701, 702 and 703 (opinions), 801, 802, 803(6) (hearsay), 902(10) (authentication) and 1001, 1002 and 1003 (best evidence rule).

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff Vanessa Bissereth prays that the Court:

- Grant her motion, and permit Stephenson to serve the proposed discovery on Defendant Javitch Block, LLC;
- Apply the Rules of Evidence to the instant case;
- Grant Bissereth all other relief to which the Court may find her entitled, at law or in equity.

Respectfully submitted,

/s/ Robert Zimmer

Robert Zimmer, Esq.

Zimmer & Associates, A Law Firm
1108 Lavaca Street, Suite 110-187
Austin, TX 78701
Phone/Fax: (512) 434-0306
zimmerlawTX@gmail.com

**ATTORNEY FOR PLAINTIFF,
VANESSA BISSERETH**

EXHIBIT "A"

NO. J5-CV-24-274397

VANESSA BISSERETH, <i>Plaintiff</i>	§	IN THE JUSTICE COURT
	§	
	§	
VS.	§	PRECINCT NO. 5
	§	
BANK OF AMERICA, N.A., and JAVITCH BLOCK, LLC, <i>Defendant</i>	§	TRAVIS COUNTY, TEXAS
	§	
	§	

**PLAINTIFF'S FIRST SET OF DISCOVERY REQUESTS
TO DEFENDANT JAVITCH BLOCK, LLC**

TO: DEFENDANT Javitch Block, LLC., c/o its counsel, Tyler Lansden, Esq. via e-mail:
 tlansden@jblc.com.

FROM: PLAINTIFF Vanessa Bissereth, by and through her attorney, Robert Zimmer,
 Esq., zimmerlawTX@gmail.com.

Plaintiff hereby serves and propounds her First Set of Discovery Requests on Defendant.

Please furnish, within 30 days after service of these Discovery Requests:

- (1) the correct name of the Defendant in this lawsuit;
- (2) the name, address, and telephone number of any potential Defendant(s);
- (3) the legal theories and, in general, the factual bases of Defendant's defenses (Defendant need not marshal all evidence that may be offered at trial);
- (4) the name, address, and telephone number of persons known to the Defendant who may have knowledge of relevant facts, and a brief statement of each identified person's connection with the case;
- (5) a copy - or a description by category and location - of all documents, electronically stored information, and tangible things that Defendant has in its possession, custody, or control, and may use to support its defenses, unless the use would be solely for impeachment;

- (6) any indemnity and insuring agreements described in Rule 192.3(f);
- (7) any settlement agreements described in Rule 192.3(g);
- (8) any witness statements described in Rule 192.3(h);
- (9) the name, address, and telephone number of any person who may be designated as a responsible third party.
- (10) The names of any testifying experts and the information as provided in Tex. R. Civ. P. 195.
- (11) The name, address, and telephone number of each witness –separately identifying those that Defendant expects to present and those it may call if the need arises.

Sincerely,

/s/ Robert Zimmer
Robert Zimmer, Esq.

Zimmer & Associates, A Law Firm
1108 Lavaca Street, Suite 110-187
Austin, TX 78701
Phone/Fax: (512) 434-0306
zimmerlawTX@gmail.com

**ATTORNEY FOR PLAINTIFF,
VANESSA BISSERETH**

CERTIFICATE OF SERVICE

I, the undersigned individual, hereby certify that a true and correct copy of the foregoing motion, exhibit, and proposed order, have been served on all parties, VIA E-FILE, on December 30, 2024

Respectfully submitted,

/s/ Robert Zimmer
Robert Zimmer, Esq.

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Robert Zimmer, Esq. on behalf of Robert Zimmer

Bar No. 24098662

zimmerlawtx@gmail.com

Envelope ID: 95725350

Filing Code Description: Motion for Discovery

Filing Description: Plaintiff's Motion to Allow Discovery as to Defendant

Javitch Block, LLC, and to Apply the Rules of Evidence / MB

Status as of 12/31/2024 8:16 AM CST

Associated Case Party: Vanessa Bissereth

Name	BarNumber	Email	TimestampSubmitted	Status
Zimmer Law		zimmerlawTX@gmail.com	12/30/2024 3:04:27 PM	SENT

Associated Case Party: Javitch Block, LLC

Name	BarNumber	Email	TimestampSubmitted	Status
Tyler Lansden		tlansden@jblc.com	12/30/2024 3:04:27 PM	SENT

NO. J5-CV-24-274397

VANESSA BISSERETH,
Plaintiff

IN THE JUSTICE COURT

VS.

PRECINCT NO. 5

BANK OF AMERICA, N.A.,
 and JAVITCH BLOCK, LLC.,
Defendants

TRAVIS COUNTY, TEXAS

PLAINTIFFS' JURY DEMAND

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW Plaintiff VANESSA BISSERETH, and pursuant to Tex. R. Civ. P., Rule 504.1(a), Plaintiff respectfully demands a trial by jury in the above-captioned case.

Respectfully Submitted,

Zimmer & Associates, A Law Firm
 1108 Lavaca Street, Suite 110-187
 Austin, Texas 78701
 Telephone/Fax: (512) 434-0306

/s/ Robert Zimmer
 By: Robert Zimmer, Esq.
 State Bar No. 24098662
 zimmerlawTX@gmail.com

**ATTORNEY FOR PLAINTIFF,
 VANESSA BISSERETH**

CERTIFICATE OF SERVICE

I, the undersigned attorney, certify that on January 7, 2025, I served a copy of Plaintiff's Jury Demand on the Court and all parties, via E-FILE.

/s/ Robert Zimmer

Robert Zimmer, Esq.

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Robert Zimmer, Esq. on behalf of Robert Zimmer
 Bar No. 24098662
 zimmerlawtx@gmail.com
 Envelope ID: 95966855
 Filing Code Description: Jury Trial Requested
 Filing Description: Plaintiff's Jury Demand /IC
 Status as of 1/8/2025 8:38 AM CST

Associated Case Party: Vanessa Bissereeth

Name	BarNumber	Email	TimestampSubmitted	Status
Zimmer Law		zimmerlawTX@gmail.com	1/7/2025 11:19:34 PM	SENT

Associated Case Party: Javitch Block, LLC

Name	BarNumber	Email	TimestampSubmitted	Status
Tyler Lansden		tlansden@jblc.com	1/7/2025 11:19:34 PM	SENT

Associated Case Party: Bank of America, N.A.

Name	BarNumber	Email	TimestampSubmitted	Status
Tyler Lansden	24118207	tlansden@jblc.com	1/7/2025 11:19:34 PM	SENT

JUDGE TANISA JEFFERS

JUSTICE OF THE PEACE, PRECINCT FIVE
TRAVIS COUNTY, TEXAS
P.O. BOX 1748
AUSTIN, TEXAS 78767

OFFICE: (512) 854-9049 FAX: (512) 854-9640
CIVIL DEPT JP5CIVIL@TRAVISCOUNTYTX.GOV
CRIMINAL DEPT JP5CRIMINAL@TRAVISCOUNTYTX.GOV



January 09, 2025

TYLER G LANSDEN
275 W CAMPBELL SUITE 312
RICHARDSON TX 75080

Re: J5-CV-24-274397

VANESSA BISSERETH

Plaintiff(s)

Vs.

JAVITCH BLOCK, LLC; BANK OF AMERICA, N.A.

Defendant(s)

You are hereby notified that the above styled and numbered case has been **SET** in accordance with TRCP 503.4 for a **PRETRIAL CONFERENCE** to include:

**DEMAND FOR JURY TRIAL AND ALL OTHER PRETRIAL MATTERS
INCLUDING DISPOSITIVE PRETRIAL MATTERS**

on, January 30, 2025 at 10:30 AM.

The case will be heard by Justice of the Peace, Judge Tanisa Jeffers. His office is located at **1000 Guadalupe Street, #117 Austin, Texas 78701**. All motions for continuance should be filed no later than Thursday of the week preceding the hearing date and must be in writing, served on the opposing party and may be granted or denied at the discretion of the court.

**YOUR FAILURE TO APPEAR AT SUCH TIME AND PLACE MAY RESULT
IN DENIAL OF ANY MOTIONS AND/OR A RULING AGAINST YOU.**

Please be prepared for court by bringing any printed copies of documents, photos and/or any other items you think are necessary to support your claim. You must also bring enough printed copies to provide a set for the court and a set for each party. **IF YOU DO NOT COME PREPARED THE COURT WILL ASSESS FEES FOR ANY ADDITIONAL COPIES REQUIRED.**

Prior to your court date, you may want to familiarize yourself with any applicable laws and rules applicable to Justice Courts as well as "Local Rules of Procedure and Rules of Decorum" for Justice Courts in Travis County which can be found at <https://www.traviscountytx.gov/justices-of-peace/jp5/links>.

Sincerely,

Civil Court Clerk for
Judge Tanisa Jeffers
Justice of the Peace, Precinct Five
Travis County, Texas

JUDGE TANISA JEFFERS

JUSTICE OF THE PEACE, PRECINCT FIVE
TRAVIS COUNTY, TEXAS
P.O. BOX 1748
AUSTIN, TEXAS 78767

OFFICE: (512) 854-9049 FAX: (512) 854-9640
CIVIL DEPT JP5CIVIL@TRAVISCOUNTYTX.GOV
CRIMINAL DEPT JP5CRIMINAL@TRAVISCOUNTYTX.GOV



January 09, 2025

ROBERT ZIMMER
1108 LAVACA STREET SUITE 110-187
AUSTIN TX 78701

Re: **J5-CV-24-274397**

VANESSA BISSERETH
Plaintiff(s)

Vs.

JAVITCH BLOCK, LLC; BANK OF AMERICA, N.A.
Defendant(s)

You are hereby notified that the above styled and numbered case has been **SET** in accordance with TRCP 503.4 for a **PRETRIAL CONFERENCE** to include:

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INCLUDING DISPOSITIVE PRETRIAL MATTERS**

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IN DENIAL OF ANY MOTIONS AND/OR A RULING AGAINST YOU.**

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Sincerely,

Civil Court Clerk for
Judge Tanisa Jeffers
Justice of the Peace, Precinct Five
Travis County, Texas